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Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: Ex Parte Notice, PS Docket No. 13-87, WT Docket No. 96-86, PS Docket No. 06-229, RM-11433

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1200, et seq., Harris Corporation (“Harris”) hereby notifies the Federal Communications Commission (“Commission”) of the following ex parte communication in the above-referenced proceedings.

On October 24, 2013, Dr. Dennis Martinez and Patrick Sullivan, on behalf of Harris, met with Jeffrey Neumann, Legal Advisor to Commissioner Pai. The discussion centered on Harris’ comments in the above-referenced proceedings.¹

Dr. Martinez discussed Harris’ proposed policies to enhance interoperability in the 700 MHz narrowband spectrum. First, he noted that the Commission should not permit analog mode operation on the 700 MHz interoperability channels. He stated that there is no reasonable need for the Commission to risk introduction of any additional negative effect on interoperability by allowing primary analog operations on the designated narrowband interoperability channels. He also made clear that the Commission should require device capability for programming to all 128 6.25 KHz 700 MHz interoperability channels. He explained that the Commission should adopt rule similar to Subsection 90.203(i) in the 800 MHz band requiring 700 MHz PS mobile and terminal radios to have the capability to be programmed for operation on all 128-6.25 kHz 700 MHz interoperability channels. In adopting such a rule, Dr. Martinez added, the Commission must be very clear that “capability to be programmed” includes compliance with the standards specified in subsections 90.548(a)(1) and (2). Dr. Martinez also detailed the need for nationwide interoperability channels to be simultaneously accessible to the user. He pointed out that the accessibility by the user is only required for the Nationwide Interoperability calling channels (4 channels); if a public safety agency wishes to make more channels accessible they can do so, thus it is reasonable for the Commission to mandate that the interoperability calling channels be accessible at all times. Dr. Martinez also stated that mandating a P25 cap should be considered as part of a holistic p25 technical and practical interoperability rulemaking. He detailed that interoperability of narrowband equipment across vendors is not simply a technical issue; it depends upon technical solutions as well as management and planning activities. Thus, simply requiring CAP certification will only address some aspects of interoperability.

¹ See Comments of Harris Corporation, PS Docket No. 13-87; WT Docket No. 96-86; RM-11433; WT Docket No. 96-86; PS Docket No. 06-229; RM-11577, filed Jun. 18, 2013.

He noted that the Commission's review of a CAP program must include an assessment of the program requirements versus test capabilities. It also must be determined, he explained, whether such capabilities can be exercised or developed in a cost effective manner such that mandating CAP certification does not significantly impact equipment cost with little or no discernible interoperability or operability benefits in all bands and for all configurations.

Dr. Martinez also made clear that the Commission should not exempt Class B boosters from the ACP requirements of 90.543(a); Harris has witnessed numerous cases of problems caused by signal boosters when multiple signals are retransmitted, exempting Class B boosters will exacerbate the situation and increase interference threats to first responders.

Dr. Martinez further proposed policies designed to enhance spectrum efficiency. To that end, he state that the Commission should allow permanent reallocation of the 700 MHz narrowband reserve channels. He also suggested that the 48 MHz narrowband reserve channel pairs should be reallocated to the general use spectrum on a permanent, nationwide basis. This will help satisfy the increasing demand for 700 MHz narrowband spectrum expected as a result of the T-Band reallocation required under the Spectrum Act. Finally, Dr. Martinez detailed a proposal to create a case by case waiver process in lieu of a blanket delay of the 700 MHz narrowbanding deadlines.

Respectfully submitted,

_____/s/_____

Patrick Sullivan
Government Relations
Harris Corporation

CC:

Jeffrey Neumann